

SOWELL GRAY STEPP & LAFFITTE, LLC  
ATTORNEYS AND COUNSELORS AT LAW

November 12, 2003

VIA HAND DELIVERY

Bruce Duke, Deputy Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Intervention in Docket Nos. 2003-326-C and 2003-327-C  
SGS&L File No. 5671/1500

Dear Mr. Walsh:

Enclosed for filing, please find the originals and 15 copies of CompSouth's Petitions to Intervene in the referenced Dockets. By copy of this correspondence I am serving the same on parties of interest. Please stamp the extra copies provided as proof of filing and return them to our courier.

Sincerely,

Robert E. Tyson, Jr.

Robert E. Tyson, Jr.  
rtyson@sowell.com

/alh

Enclosures

cc: F. David Butler, General Counsel  
Florence P. Belser, Executive Assistant to Commissioners  
Elliot F. Elam, Jr., Esquire  
John J. Pringle, Jr., Esquire  
Patrick W. Turner, Esquire

1310 Gadsden Street  
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Columbia, SC 29211

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**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

Docket No. 2003-327-C

In Re:

Continued Availability of Unbundled High  
Capacity Loops at Certain Locations and  
Unbundled High Capacity Transport on  
Certain Routes Pursuant to the Federal  
Communication Commission's Triennial  
Review Order

**PETITION OF THE COMPETITIVE  
CARRIERS OF THE SOUTH, INC.  
TO INTERVENE IN DOCKET  
NUMBER 2003-327-C**

Pursuant to Rule 103-836 of the Regulations of the Public Service Commission of South Carolina ("Commission"), the Competitive Carriers of the South, Inc. ("CompSouth") submits its petition to intervene in the above-captioned Docket Number 2003-327-C. In support hereof, CompSouth shows as follows:

1. CompSouth is a non-profit association duly organized and existing under the laws of the State of Georgia. CompSouth is an association of competitive local exchange carriers serving residential and business telecommunications customers throughout the State of South Carolina. CompSouth intervenes on behalf of its member companies.<sup>1</sup>

2. The legal name and address of CompSouth are as follows:

Competitive Carriers of the South, Inc.  
4092 South Memorial Parkway  
Huntsville, Alabama, 35802

3. The full name and address of the authorized representative of CompSouth are

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<sup>1</sup> Member companies of CompSouth include ITC^DeltaCom; MCI; NewSouth Communications, Corp.; AT&T; Nuvox Communications, Inc.; ACCESS Integrated Networks, Inc.; Birch Telecom; Talk America; Cinergy Communications Company; Network Telephone Corp.; Momentum Business Solutions, Inc.; Xspedius Management Co., LLC; Z-Tel Communications, Inc.; Covad Communications Company; KMC Telecom; IDS Telecom, LLC; Access Point Inc.; and LecStar Telecom, Inc.

as follows:

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
1310 Gadsden Street  
Columbia, South Carolina 29201

4. On November 7, 2003 the Commission issued an Order setting hearing dates and opening dockets for the state proceedings required by the Federal Communications Commission ("FCC") in its Triennial Review Order of Section 251 unbundling obligations of Incumbent Local Exchange Carriers ("TRO").

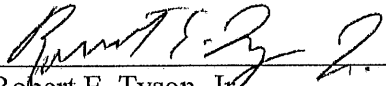
5. CompSouth has an interest in the instant proceeding because its member companies provide telecommunications services to thousands of small business and residential customers of South Carolina.

6. As a provider of these telecommunications services, CompSouth's interests are not adequately represented by any other party to this proceeding. Accordingly, CompSouth requests that it be permitted to intervene in this proceeding in order to protect its interest.

7. The position of CompSouth in this proceeding is to assist the Commission in its fact-finding role to determine whether impairment exists within the State of South Carolina and within the local markets in South Carolina.

8. CompSouth is informed and believes that granting its request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing the views and concerns of CompSouth can be developed.

WHEREFORE, for the foregoing reasons, CompSouth respectfully submits its intervention in the above-captioned Docket Number 2003-327-C and requests that it be permitted to participate therein with full rights as a party.

By:   
Robert E. Tyson, Jr.  
SOWELL GRAY STEPP & LAFFITTE, L.L.C.  
Post Office Box 11449  
Columbia, South Carolina 29211  
(803) 929-1400

Attorneys for Competitive Carriers of the South, Inc.

Columbia, South Carolina  
November 12 2003

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

Docket No. 2003-326-C

In Re:

Analysis of Continued Availability of  
Unbundled Local Switching for Mass  
Market Customers Pursuant to the Federal  
Communication Commission's Triennial  
Review Order

**PETITION OF THE COMPETITIVE  
CARRIERS OF THE SOUTH, INC.  
TO INTERVENE IN DOCKET  
NUMBER 2003-326-C**

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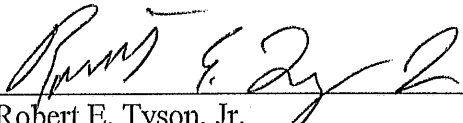
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Attorneys for Competitive Carriers of the South, Inc.

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